

**Submission information**

Form: Comment on EPA's Proposed Cleanup Plan for the Portland Harbor Superfund Site

Submitted by: (b) (6)

Wednesday, September 7, 2016 - 10:06

(b) (6)

**Your Name**

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**Your Email**

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**Your Comments**

Linnton Neighborhood Association  
c/o Neighbors West Northwest  
2257 NW Raleigh St.  
Portland, OR 97210

September 6, 2016

ATTN: Harbor Comments  
U.S. EPA  
805 SW Broadway, Suite 500  
Portland, OR 97205

With 31 members in attendance the Linnton Neighborhood Association adopted the following motion at our July 6, 2016 neighborhood meeting:

Whereas the Linnton Neighborhood Association voted at our January 2016 meeting to endorse option G+, an alternate cleanup option than what the EPA proposed in November 2015 for cleaning up the Portland Harbor Superfund site. LNA joined a wide range of Indian Nations and community organizations proposing a more aggressive cleanup of the Portland Harbor including the Yakama Nation, American Rivers, Audubon Society of Portland, Groundwork Portland, Northwest Steelheaders, Pacific Rivers, Sierra Club, Willamette Riverkeeper, Portland Harbor Community Advisory Group and Portland Harbor Community Coalition.

Therefore, Linnton Neighborhood Association adopts the following positions and urges its members to submit their own comments by September 6, 2016 reflecting key concerns and recommendations adopted by the Portland Harbor Community Advisory Group (PHCAG):

- Removal of the major portion of contamination by dredging: the Proposed Plan includes dredging only 150 acres. Our estimate is that to reduce contaminant levels sufficiently would require dredging approximately 1,000 acres of river bottom. Contaminant should be removed from the river, not simply stored in or next to the river for potential future exposure.
- No toxic dump at Terminal 4: Relocating dredged material into a Confined Disposal Facility (CDF) at Terminal 4 north of St. Johns will not survive a future Cascade subduction zone earthquake and will likely pollute the river again.
- During the time of active cleanup air and water quality monitoring is necessary to ensure health of workers and adjacent neighborhoods or any neighborhoods affected by construction.
- We must have a cleanup that at the end results a healthy fish population so that the current fish consumption advisory on this section of the river from the Oregon Department of Health can be removed.
- Hold strong to the principle of "polluter pays". The EPA has identified 150-200 businesses and entities as potentially responsible for the pollution, many of them still in operation - Shell, Exxon Mobil, BP, and Bayer Cropscience.
- All local, state and federal authorities should coordinate together on an overall river basin plan to remove pollutant sources and protect the Willamette River for all citizens and wildlife.

Sincerely,

(b) (6)

Chair, Linnton Neighborhood Association

cc: Senator Ron Wyden  
Senator Jeff Merkley  
Congresswoman Suzanne Bonamici  
Congressman Earl Blumenauer  
Congressman Kurt Schrader  
Governor Kate Brown  
State Senator Betsy Johnson  
State Representative Brad Witt  
Portland City Council  
Multnomah County Commission